

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION
(Electronically Filed)**

MILDRED BALDWIN and	:	
DOUGLAS DYRSSEN SR.,	:	
On Behalf of Themselves and All Others	:	
Similarly Situated,	:	
 Plaintiffs,		
	:	
v.	:	Case No, 2:21-cv-04066-WJE
 NATIONAL WESTERN LIFE INSURANCE		
COMPANY,	:	
 Defendant.		
	:	

**PLAINTIFFS' UNOPPOSED MOTION
FOR LEAVE TO FILE EXCESS PAGES FOR THEIR
SUGGESTIONS IN SUPPORT OF THEIR MOTION FOR APPROVAL OF
ATTORNEYS' FEES, EXPENSES, AND
SERVICE AWARDS TO CLASS REPRESENTATIVES**

Pursuant to this Court's Local Rule 7, Plaintiffs Mildred Baldwin and Douglas Dyrssen Sr., individually and on behalf of others similarly situated ("Plaintiffs"), by and through counsel of record, request leave of Court to file their Suggestions in Support of their Motion for Approval of Attorneys' Fees, Expenses, and Service Awards (the "Motion for Attorneys' Fees") in excess of the 15-page limit established by Local Rule 7(d)(1)(A).

In support of this motion (the "Motion for Leave"), Plaintiffs state as follows:

1. Plaintiffs will file on March 21, 2022 their Motion for Attorneys' Fees.
2. Given the number and scope of the issues that a party is required to address under the factors that Eighth Circuit courts consider in evaluating a motion for attorneys' fees in the context of a class action, Plaintiffs believe that the 15-page limit under this Court's Local Rules

for suggestions in support of motions is insufficient for the Suggestions in Support of the Motion for Attorneys' Fees.

3. Plaintiffs therefore request that the Court grant them leave to submit 23 pages for their Suggestions in Support of the Motion for Attorneys' Fees, and eight (8) page extension.

4. Defendant's counsel has indicated to Plaintiffs' counsel that Defendant does not oppose Plaintiffs' request to submit 23 pages for its Suggestions in Support of their Motion for Attorneys' Fees.

5. This Motion for Leave is filed in good faith, and not for the purpose of oppression, harassment, or delay.

WHEREFORE, Plaintiffs respectfully request that the Court grant this Motion for Leave, and permit Plaintiffs to file their Suggestions in Support of their Motion for Attorneys' Fees, up to and including 23 pages, and such other relief as this Court deems just and proper.

Dated March 21, 2022

Respectfully submitted,

*/s/*David K. Lietz
David K. Lietz (admitted *pro hac vice*)
MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC
5335 Wisconsin Avenue NW
Suite 440
Washington, D.C. 20015-2052
Telephone: (866) 252-0878
Facsimile: (202) 686-2877
dlietz@milberg.com

J. Gerard Stranch, IV (admitted *pro hac vice*)
BRANSTETTER, STRANCH &
JENNINGS, PLLC
223 Rosa Parks Avenue, Suite 200
Nashville, TN 37203
Tel: (615) 254-8801
gerards@bsjfirm.com

Lynn A. Toops (admitted *pro hac vice*)
Lisa M. La Fornara (admitted *pro hac vice*)
COHEN & MALAD, LLP
One Indiana Square
Suite 1400
Indianapolis, IN 46204
Tel: (317) 636-6481
ltoops@cohenandmalad.com
llaifornara@cohenandmalad.com

Samuel J. Strauss (admitted *pro hac vice*)
TURKE & STRAUSS LLP
613 Williamson Street Suite 201
Madison, WI 53703
Tel: (608) 237-1775
Sam@turkestrauss.com

James J. Rosemergy
CAREY DANIS & LOWE
8235 Forsyth Blvd., Ste. 1100
St. Louis, MO 63105
Tel: (314) 725-7700
Fax: (314) 721-0905
jrosemergy@careydanis.com

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing by electronic mail to the attorneys and parties of record.

/s/*David K. Lietz*

David K. Lietz